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May 20, 2016

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VIA ECF

Honorable Edgardo Ramos, U.S.D.J.
United States District Court
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York NY 10007

Re: Shekar v. Delancey's Orchard LLC, et al.
Civil Action No. 15-CV-05022-ER
Our file No. 20019.001

Dear Judge Ramos:

We represent the Defendants, Delancey's Orchard LLC d/b/a Freshco Deli and Grocery, Pratik Shah, Kayum Mohammed, and Rishi Shah, in the above-referenced action. We write to respectfully request an extension of the non-expert discovery deadline, from May 20, 2016 until June 6, 2016, for the sole purpose of deposing the Plaintiff. The deadline for all discovery is on June 6, 2016, so the extension of time for the sole purpose of deposing Plaintiff will not affect any of the other dates currently in place pursuant to your Honor's Civil Case Management Plan.

The deposition of Rishi Shah was completed on May 17, 2016, and all other discovery has been completed in this case (except for possible requests for production made at parties' depositions). Defense counsel was available to depose Plaintiff on May 20, 2016, but Plaintiff was not available. Defense counsel has also attempted to contact Plaintiff's counsel regarding the brief extension of this deadline and requested available dates for the deposition of Plaintiff. However, at this time, Plaintiff's counsel has not responded to that request. Thank you for your consideration of this matter.

Respectfully submitted,



Marshall B. Bellovin, Esq. (MB 5508)
Member of the Firm
Counsel for Defendants

cc: Louis Pechman, Esq. (via ECF)
Counsel for Plaintiff

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